

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

SAMUEL VAZQUEZ-MORALES

Case No.

5:19-mj-404-1

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of APRIL 1, 2019 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

Title 8 United States Code, Section
 1324(a)(1)(A)(ii) and (v)(I)

Offense Description

Did knowingly transport and move, attempt to transport and move, and
 conspired to transport and move within the United States by means of
 transportation and otherwise, an alien who had come to, entered, remained in
 the United States in violation of law in furtherance of such violation, for the
 purpose of commercial advantage and private financial gain.

This criminal complaint is based on these facts:

See attachment "A".

☒ Continued on the attached sheet./S/ Micah J. Sublett*Complainant's signature*Micah J. Sublett, HSI Special Agent*Printed name and title*

Sworn to before me and signed in my presence.

Date: 04/03/2019*Judge's signature*City and state: Laredo, TexasDiana Song Quiroga, U.S. Magistrate Judge*Printed name and title*

ATTACHMENT "A"

Page 1

1. On April 1, 2019, Homeland Security Investigations (HSI) Special Agents (SAs) received a request for investigative assistance from the United States Border Patrol (USBP). HSI SAs responded to the Laredo South Border Patrol station in Laredo, Texas and conducted post arrest interviews. HSI SAs subsequently arrested Samuel VAZQUEZ-Morales for violations of 8 USC 1324 (a)(1)(A)(ii) and (v)(I) and initiated an investigation.
2. HSI SAs responded to the Laredo South Border Patrol station and discovered the following:
3. On April 1, 2019, Border Patrol Agent (BPAs) were working their assigned duties in Webb County near Laredo, Texas. BPAs apprehended a group of seven (7) undocumented aliens (UDAs) in the brush. All seven UDAs were transported to the Laredo South Border Patrol station for interviews and processing.
4. HSI SAs were notified and arrived on scene and conducted interviews. HSI SAs advised Samuel VAZQUEZ-Morales of his Miranda rights in the Spanish language, which he verbally stated he understood and was willing to talk to HSI SAs without an attorney present.
 - VAZQUEZ-Morales stated he was a citizen of Mexico, illegally present in the United States. VAZQUEZ-Morales also stated that he had been hired to guide the group of UDAs across the river and into the United States. VAZQUEZ-Morales further stated that he was to be paid \$400 United States Dollars (USD) to guide the group of UDAs into the United States. VAZQUEZ-Morales claims that after he led the group into the United States illegally, they were to be picked up by a black colored Ford F-150 pickup truck. VAZQUEZ-Morales claimed that he knew he was smuggling six (6) individuals - five (5) Chinese nationals and one (1) Brazilian national.
5. The following two (2) individuals are being held as material witnesses and admitted to illegally entering in the United States by crossing the Rio Grande river to then be smuggled to unknown locations within the United States for varying amounts of money.
 - Chinese nationals, Liwie GAO and Li-Hui HUANG, are being held as material witnesses in the case against VAZQUEZ-Morales. Both material witnesses made arrangements with unknown smugglers to be smuggled to unknown cities in the

United States. All material witnesses stated they were going to be charged a smuggling fee varying from an unknown amount of money to \$30,000 USD.

- Liwie GOA claimed that he is a citizen of the People's Republic of China, and that he flew out of Shanghai, China to Mexico. GOA claimed that his destination was an unknown location within the United States. GOA also identified VAZQUEZ-Morales via a six (6) person photographic array, as the person guiding him through the brush after crossing the river.
- Li-Hui HUANG claimed that he is a citizen of the People's Republic of China, and that he flew out of Shanghai, China to Mexico. HUANG claimed that he was to pay \$30,000 USD to be smuggled into the United States, which he would pay back after his arrival to the United States. HUANG did not identify VAZQUEZ-Morales via a six (6) person photographic array but described the person who was guiding him through the brush as being young and wearing green or black clothing. The suspected guide, VAZQUEZ-Morales, is 18 years old and was apprehended wearing a black shirt and blue jeans.